

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10019-JSR

**THIRD-PARTY DEFENDANT JAMES STALEY’S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Third-Party Defendant James E. “Jes” Staley hereby respectfully requests that the Court enter summary judgment on his behalf and against Third-Party Plaintiff JPMorgan Chase Bank, N.A. (“JPMorgan”) on Counts I (Indemnification), II (Contribution), III (Breach of Fiduciary Duty), and IV (Violation of the Faithless Servant Doctrine) of JPMorgan’s Third-Party Complaint. The reasons supporting this motion are set forth in the separately filed Memorandum of Law and Local Rule 56.1 Statement of Undisputed Material Facts.

Date: August 25, 2023

Respectfully submitted,

By: /s/ Stephen L. Wohlgemuth

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